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FCC Mail Room
February 20, 2009

Global Online Electronic Services
271 Main Street, Suite C
Hackettstown, NJ 07840-2032

TO: Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street Suite TW-A325
Washington, DC 20554

FROM: Norman Brandinger, President
Global Online Electronic Services

Subject: EB Docket No. 06-36

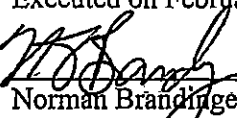
Global Online Electronic Services (GOES) Annual Certification CPNI Filing Under 47 C.F.R. §64.2009(e)

1. Pursuant to the Federal Communications Commission ("Commission") pursuant to section 222 of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. §222 and the Commission's rules, 47 C.F.R. §64.2001, *et seq.*, as amended rule 47 C.F.R. §64.2009(e)
 - a. Provide annual certification to the Commission,
 - b. Provide explanation of any actions taken against data brokers in the past year,
 - c. Provide a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.
2. To protect customer proprietary network information ("CPNI"), GOES has had in place and continues to provide customer safeguards and appropriate security measures in accordance with CPNI rules since its first operational testing of VOIP services and customer billing in July of 2006, and continues to do so as a fundamental business principal. GOES did make a CPNI filing (with no customers on the books) on February 3, 2006 in accordance with FCC 47 C.F.R. par. 64.2009(e) FCC confirmation number 200623060361, Docket: 06-36 and again on December 21, 2007.
3. GOES is an Internet Service Provider (ISP) that has offered VOIP services for sale as of November 2007 and continues test and evaluate CPNI as part of its business expansion plans. We believe that we have been in compliance with CPNI rules, prior to and continue to be in compliance during commercial testing and operation of the service. GOES Annual Compliance Certificate and Certification are enclosed.
4. GOES has previously provided its Training Manual, which covers protections of CPNI data including pretexting. Additional tracking forms to maintain CPNI compliance under 47 C.F.R. §64.2009(e) are attached.

All statements provided comply with Commission's rules 47 C.F.R. §1.16 as set forth therein.

I declare under penalty of perjury that the foregoing is true and correct and that all the Documents and information provided as of February 20, 2009, are in GOES possession, custody control or knowledge have been reproduced.

Executed on February 20, 2009


Norman Brandinger, President
Global Online Electronic Services
Encl.

No. of Copies rec'd _____
List ABCDE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 20, 2009

Name of company covered by this certification: Global Online Electronic Services

Form 499 Filer ID: 0016081317

Name of signatory: Norman Brandinger

Title of signatory: President

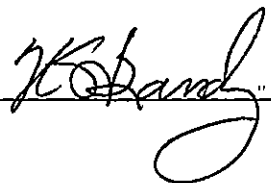
I, Norman Brandinger, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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www.goes.com

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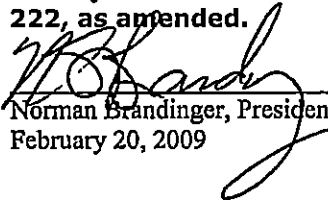
Annual Compliance Certificate for Global Online Electronic Services (GOES)

CPNI Reference 47 C.F.R. §64.20009(e): "Safeguards required for use of customer proprietary network information".

§64.20009(e)

- (a) GOES implemented a system whereby which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. This system was in place prior to the start of commercial testing in July 2006 and is described in GOES Privacy and Customer Security Policies and Procedures, Vol. 1, Operating Procedures to Ensure Compliance. Pursuant to the Federal Commission ("Commission") pursuant to section 222 of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. §222 and the Commission's rules, 47 C.F.R. §64.2001, *et seq.*
- (b) Reference Public Notice DA 09-240 guidance on amended rule 47 C.F.R. §64.2009(e), GOES policy procedures have been updated to include provisions for:
 - a. Annual certification to the Commission,
 - b. Recording reasons for any actions taken against and data brokers in the past year,
 - c. Summarizing all customer complaints received in the past year concerning the unauthorized release of CPNI.
- (b) GOES has trained all current personnel as to when they are not authorized to use CPNI, disciplinary processes are in place as specified in GOES Privacy and Customer Security Policies and Procedures, Vol. 1, Operating Procedures to Ensure Compliance that states "Employee violations in the handling and/or unauthorized disclosure of customer proprietary information are cause for termination....".
- (c) GOES maintains a record of the use of customer's CPNI in accordance with the requirements of this subsection. GOES Privacy and Customer Security Policies and Procedures, Vol. 1, Operating Procedures details our handling of CPNI data.
- (d) GOES's Privacy and Customer Security Policies and Procedures, Vol. 1, Operating Procedures details our annual review process to ensure compliance with the rules in this subpart. Specifically, only trusted, security trained employees are permitted access to customer information and are not permitted to disclose it to third parties except with written approval of the customer or as required by law.
- (e) GOES's President is the corporate agent responsible for and has personal knowledge of the company's established operating procedures that adequately ensure compliance with the rules of this subpart.
- (f) GOES Privacy and Customer Security Policies and Procedures, Vol. 1, Operating Procedures specifies the requirement of providing the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. GOES will provide notification within five (5) business days in letter form including all information in accordance with this subpart.

As President and Agent for GOES, I, Norman Brandinger, have personal knowledge and am responsible for GOES compliance with CPNI and have overseen the establishment of operating procedures that are in compliance with the rules in this subpart. Previously filed with the Commission is GOES Privacy and Customer Security Policies and Procedures, Vol. 1, (December 2007) Ref.: Title 47, Chapter 5, Subchapter II, Part I § 222, as amended.



Norman Brandinger, President
February 20, 2009

GLOBAL ONLINE ELECTRONIC SERVICES
PRIVACY AND CUSTOMER SECURITY POLICIES AND PROCEDURES
DATA BROKER ACTIONS

#	NAME OF DATA BROKER	DATE OF ACTION	EXPLANATION OF ACTION TAKEN	COMMENTS
1				
2				
3				
4				
5				
6				
7				
8				
9				

Global Online Electronic Services

[illegible]